



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

Alex Poitevint, Treasurer  
Republican National Committee -RNC  
310 First Street SE  
Washington, DC 20003

FEB 2 2000

Identification Number: C00003418

Reference: November Monthly Report (10/1/99-10/31/99)

Dear Mr. Poitevint:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Please clarify all expenditures made for Ad Cost and Fax Broadcasting on Schedules B and H4. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedule B, E or F supporting Line 23, 24 or 25 and include the amount, name, address and office sought by each candidate. 11 CFR §§104.3(b) and 106.1

-Your EVENT YEAR-TO-DATE calculations for Administrative/Voter Drive are incorrect. EVENT YEAR-TO-DATE totals for administrative and voter drive costs are derived by aggregating all disbursements during the calendar year for the whole Administrative/Voter Drive category. EVENT YEAR-TO-DATE totals for fundraising, direct candidate support, and exempt activities are derived by aggregating all disbursements during the calendar year within a specific event. These should be calculated by adding the latest disbursement for a category or event to the previous EVENT YEAR-TO-DATE total for that category or event. This running EVENT YEAR-TO-DATE total should be disclosed after each disbursement is listed. Please amend your report by providing the correct EVENT YEAR-TO-DATE totals.

-Your report discloses in-kind contributions ("donations") from corporations on Schedule H4, supporting Line 21(a) of the Detailed Summary Page. Pursuant to Advisory Opinion 1992-33, the Commission concluded that a "national party committee may accept corporate in-kind donations in connection with fundraising activities" as long as the "federal share of the goods or services is paid or transferred to the non-federal account in advance" of the acceptance of the corporate donations by the federal account.

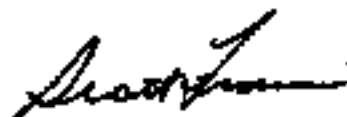
Advisory Opinion 1992-33 also discloses a detailed method for reporting the receipt of corporate in-kind donations on the committee's I Schedules as follows:

The full amount of the in-kind contributions received by the non-federal account should be disclosed on Schedule I with a supporting memo Schedule A that itemizes each contributor's identification. 11 CFR 104.8(e) In addition, in order to reflect the fact that the reported in-kind contributions have been expended in the same period as received by the committee, the total amount of the in-kind contributions should be entered on Line 5 of Schedule I as an other disbursement with a notation reference to the memo Schedule A filed for Line 1. Alternatively, the committee may include the total amount of in-kind contributions to the non-federal account on Line 1 and then make a cross reference to the entries on Schedule H4 to which the total amount relates. This reference should specify particular pages of the Schedule H4 where the in-kind donors are identified.

Please amend your I Schedules to disclose non-federal in-kind contributions in accordance with Advisory Opinion 1992-33.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 694-1130.

Sincerely,



Scott A. Francis  
Reports Analyst  
Reports Analysis Division

